

EXHIBIT E

Juan Carlos Felix, M.D.

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 CHARLESTON DIVISION
4
5 IN RE: ETHICON, INC., PELVIC)
 REPAIR SYSTEM PRODUCTS)
6 LIABILITY LITIGATION,) Master File No.
 _____) 2:12-MD-02327
7)
 THIS DOCUMENT RELATES TO:) MDL No. 2327
8)
 Loustaunau, Donna v. Ethicon,) JOSEPH R. GOODWIN
9 Inc., et al.) U.S. DISTRICT JUDGE
)
10 Case No.: 2:12-cv-00666)
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DEPOSITION OF JUAN CARLOS FELIX, M.D.

Monday, March 28, 2016

Long Beach, California

Reported By: Kristi Johnson, CSR 12585

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Deposition of JUAN CARLOS FELIX, M.D., taken on
 behalf of the Plaintiffs, before Kristi Johnson, CSR
 No. 12585, commencing on Monday, March 28, 2016, at
 9:44 a.m., at 111 East Ocean Boulevard, Long Beach,
 California, pursuant to Notice of Taking Deposition.

Juan Carlos Felix, M.D.

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Juan Carlos Felix, M.D.

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1 A. A pathologist is a physician who analyzes
2 tissues and bodily fluids and renders diagnoses.

3 Q. Are you a neuropathologist?

4 A. I am not.

5 Q. How does a neuropathologist differ from a
6 pathologist?

7 A. A neuropathologist is a pathologist who
8 undergoes additional training in the area of the brain,
9 spinal cord, and peripheral nerves.

10 Q. Is there a board certification in
11 neuropathology?

12 A. Yes, there is.

13 Q. You do not have that certification; is that
14 correct?

15 A. I do not.

16 Q. What board certifications do you have?

17 A. I am certified in anatomical pathology and in
18 cytopathology.

19 Q. Anything else?

20 A. That's all.

21 Q. Now, we have an agreement through Counsel that
22 I'm not going to rehash any of your general opinions that
23 you gave previously in the Ethicon litigation in the
24 Mullins case and in the Garcia case, but I want to just
25 confirm that those opinions that you rendered in those

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1 reliance list that bear upon Ms. Loustau's case
2 specifically that you would point to this article as
3 helpful for Ms. Loustau's case in particular because
4 of some reason?

5 A. There aren't. Other than providing me general
6 knowledge to the matter that I have been asked to review
7 this case, none of them provide any support or evidence
8 against what my opinions are.

9 Q. Now, with regard to the documents that were
10 reflected on your exhibit list, do you see that section
11 midway? It's right after the medical literature.

12 A. Yes.

13 Q. Now, were these documents selected by you? Was
14 this subset of Ethicon documents created by you, or was
15 it provided to you by Ethicon's counsel?

16 A. It was provided to me by Ethicon's counsel, at
17 my request, to learn as much as possible about the
18 material.

19 Q. So you asked Ethicon's counsel, please send me
20 all of the internal documents that you think might be
21 helpful for my general opinions and case-specific
22 opinions; is that fair?

23 A. Yes.

24 Q. And these are the sum total of the documents
25 that Ethicon's counsel provided you in response to that

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1 inquiry; correct?

2 A. Yes. I think, yes.

3 Q. Are there any in here -- have you reviewed
4 documents, internal Ethicon documents, other than what's
5 in here?

6 A. No. This is all that I have reviewed.

7 Q. Have you asked for any additional documents in
8 response to looking at one of these documents?

9 A. God, no.

10 Q. And do any of these particular documents bear
11 upon Ms. Loustaunau's case specifically?

12 A. They do not.

13 Q. Did you review in detail each and every one of
14 those documents?

15 A. Yes.

16 Q. In the specimen for Ms. Loustaunau that you
17 reviewed, we talked about the inflammation you saw in the
18 photomicrograph.

19 Was that the only abnormality that you saw, or
20 were there any other abnormalities you observed, either
21 on the photomicrographs or on the slide that you reviewed
22 microscopically?

23 MR. THOMAS: Object to the form of the
24 question.

25 THE WITNESS: I did not.